

PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

September 10, 1998

Ash Grove Cement Company
c/o Henrik Voldbaek, Plant Manager
3801 East Marginal Way South
Seattle WA 98134

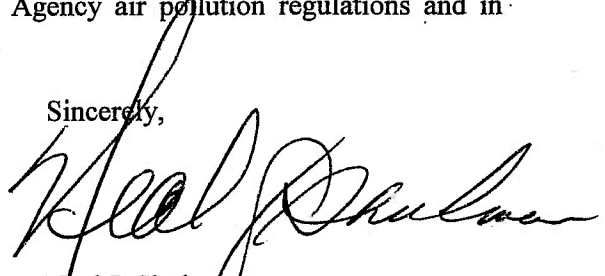
Dear Mr. Voldbaek:

Ash Grove Cement Company
Notice and Order of Civil Penalty No. 8908

This Agency wishes to acknowledge and thank you for check #15783. The funds (\$3,000.00) from this check, when deposited to the Agency, are accepted in full payment of Notice and Order of Civil Penalty No. 8908.

Thank you for your action to ensure compliance with Agency air pollution regulations and in joining with this Agency in efforts to achieve cleaner air.

Sincerely,



Neal J. Shulman
Manager - Inspection

NJS:ml

cc: Laurie Halvorson, Agency Counsel
Accounting
Rosemary Busterna, Senior Air Pollution Inspector
Rick D. Hess, Senior Air Pollution Inspector
Melissa McAfee, Air Pollution Inspector
Elizabeth Gilpin, Air Pollution Inspector

AGCS2M001380

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
Dave Somers, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlotte Garrido, Commissioner, Kitsap County
Doug Sutherland, Pierce County Executive

PUGET SOUND AIR POLLUTION CONTROL AGENCY)
a municipal corporation of the state of Washington)
110 Union Street, Suite 500)
Seattle, Washington 98101-2038)

VS

ASH GROVE CEMENT COMPANY
c/o Henrik Voldbaek, Plant Manager
3801 East Marginal Way South
Seattle, Washington 98134

NO. 8908

**NOTICE AND ORDER
OF CIVIL PENALTY**

You are hereby notified that, pursuant to Chapter 70.94 RCW and Notice of Violation No. 36225, a copy of which has been previously provided to you or your agent, you have violated Condition No. 7 of Order of Approval No. 5730 of the Puget Sound Air Pollution Control Agency in the following particulars:

On or about the 28th day of March 1997, at 3801 East Marginal Way South in the city of Seattle, King County, state of Washington, during start up of the kiln, you caused or allowed SO2 emissions from the main stack in excess of 200 ppm corrected to 10% O2 for one-hour average in violation of Condition No. 7.

As a result of the foregoing violation(s), a penalty is assessed against you as follows:

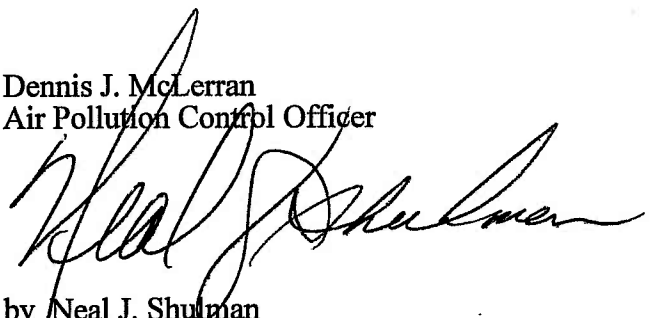
For the violation(s) that occurred on or about the 28th day of March 1997, wherein you caused or allowed SO2 emissions during start up of the kiln in excess of 200 ppm corrected to 10% O2 for one-hour average, in violation of Condition No. 7 of Order of Approval No. 5730 of the Puget Sound Air Pollution Control Agency, a penalty is assessed against you in the amount of three thousand dollars (\$3,000.00).

The full amount of this penalty is due and payable within thirty (30) days of receipt of this notice, unless within such time a request for hearing is filed. (See reverse side for both mitigation procedures and appeal procedures.)

In the event the full amount of this penalty is not paid on or before thirty (30) days of receipt of this notice, or a request for mitigation has not been made to this Agency, or a request for hearing has not been made to the Pollution Control Hearings Board of Washington and the Air Pollution Control Officer, action will be commenced in court to recover such penalty.

Dated this 12th day of August 1998.

Dennis J. McLerran
Air Pollution Control Officer


by Neal J. Shulman
Manager - Inspection

Certified Mail No. Z 334 353 808

Paid 8/13/98

AGCS2M001381

Registration No. 11339

Cert. Mail No. 2 334 353 506

No. **36225**

NOTICE OF VIOLATION

Date of Violation: March 28, 19 97 at _____ m.

Name Ash Grove Cement Co.	Responsible Person, Title Henrik Voldbaek Manager		
Location of Violation (Address) 3801 E Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As above	City, State Seattle, WA.	Zip 98134	Phone (206) 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 7
- ☐ Section During start up of the kiln SO₂ emissions from the main stack are not to exceed 200 ppm corrected to 10% O₂ for 1 hr. Ave.
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION March '97 CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature] Date/Time: 6/5/97
Air Pollution Inspector
Received By: _____
Signing this Notice is not an admission of guilt
AGCS2M001382

February 25, 1998

Ms. Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Dear Ms. Gilpin:

The following is per our February 3, 1998 meeting in which, PSAPCA requested additional explanation about three SO₂ events that occurred during preheat.

NOV # 36225 The SO₂ exceedance on 03/28/97 was inadvertently reported in the March 1997 CEM report as having occurred during preheat. Upon reexamination, it was determined that this event actually occurred in the first hour following the introduction of feed to the kiln. A search of our records have failed provide information that adequately explains the cause of this event. However, given the proximity in the dates of occurrence and duration of exceedance time the cause is possibly similar to the 04/01/97 event

NOV # 36228 The SO₂ exceedance on 04/01/97 was accurately reported in the April 1997 CEM report. The cause was caused by the sorbent system shutting down due to erratic flow of the kiln feed from the 4000 ton storage silos. The erratic flow of the kiln feed caused the screw conveyer supplying the 50 ton feed bin to overload and shut down. The sorbent system, which feeds into this screw conveyer, shut down automatically on an interlock. The kiln feed screw was restarted but an oversight delayed the restart of the sorbent system. Immediate corrective action was taken by the operator by restarting the sorbent system. . The operator was reminded that it is imperative to restart the sorbent system in such a case. See explanation for NOV # 36231.

NOV # 36231 The SO₂ exceedance on 04/24/97 was shown in April 1997 CEM report to have occurred during preheat. Upon reexamination, it was determined that this event actually occurred in the first hour following the introduction of feed to the kiln. The explanation and corrective action for this event is the same as NOV #36228. However because of the reoccurring nature of the situation, the controls for the sorbent system were programmed to automatically restart with the kiln feed system to reduce the chance for operator oversight or any delay.

Sincerely yours,

Gerald J. Brown
Manager, Safety and Environment

cc H. Voldbaek

AGCS2M001383

SO2 EXCURSION		STARTUP		PREHEAT Before Feed On			KILN START After Feed On		
NOV #	Date of occurance	Preheat	Feed on	Time of occurance	Duration	Max ppmc	Time of occurance	Duration	Max ppmc
36225	03/28/97	03/27/97 - 22:25 to 03/28/97 - 02:00	03/28/97 - 02:00 to 03/29/97 - 02:00	00: 00 - 01:00	2 hour	563	02: 00	1 hour (See Exp.2)	443
36228	04/01/97	03/31/97 - 13:05 to 03/31/97 - 13:17	03/31/97 - 13:17 to 04/01/97 - 13:17				04: 00	1 hour (See Exp.3)	213
36231	04/24/97	04/24/97 - 15:15 to 04/24/97 - 11:30	04/24/97 - 11:30 to 04/25/97 - 11:30				12:00	1 hour (See Exp.4)	244